

### REMARKS

This paper is responsive to an Office Action mailed September 4, 2007. Prior to this response, claims 1-30 were pending. After amending claims 1-2, 4, 6, 16, and 21, and canceling claims 5, 10, 20, and 25, claims 1-4, 6-9, 11-19, 21-24, and 26-30 remain pending.

In Section 2 of the Office Action claims 1-30 have been rejected under 35 U.S.C. 102(e) as anticipated by Kawamoto (US 7,199,890). The Office Action states that Kawamoto discloses all the elements of independent claims 1 and 16. This rejection is traversed as follows.

Generally, Kawamoto describes a system for automatic selection (switching) of a printer/printer driver from a pool of printers. Application data is first passed through a first (common) printer driver 301, which produces a common output that is independent of the target printer. The output (e.g., intermediate format) is then directed towards the system spooler. Depending on the current print condition (e.g., availability, speed, error, etc.), a printer is picked from the printer pool. Once a printer is selected, a printer driver specific to the printer is determined (e.g., driver 203, 601, or 602). A despooler 305 then plays the graphics commands from the common output back to the selected printer driver. The selected printer driver 203 then converts the output to a format specific to the selected printer, spools the output to a second spooler 204, and sends printer specific data to the printer 1500.

In summary, Kawamoto discloses Microsoft EMF print spooling. The novelty in the disclosure appears to be that the common

output file is held until job completion, and if an error occurs, a new printer can be selected and the process repeated.

In contrast, the Applicant's disclosure describes a single pass through the spooler system for a virtual printer driver (VPD) that configures itself on-the-fly to a specific printing condition. No driver switching occurs, and no second pass is required through the driver, as is disclosed by Kawamoto. Instead, the claimed invention driver can load dynamically determined plugins (e.g., DLLs) that in effect customize the driver on-the-fly to the target printer.

The intermediate code (IR) pass makes it possible for third parties to write these plugins, as the IR format can be used as a standard input format. Secondly, depending on the stage after the plugin, the plugin can be programmed to output in the same IR format, or final printer format. In the later case, the output can be pipelined through a chain of plugins.

Generally, the differences between Kawamoto and the claimed invention are as follows. Kawamoto's method does not perform multiple processes upon intermediate code within a single print driver. Instead, Kawamoto's method requires the common data to be written to disk (1<sup>st</sup> spooler pass) and then read back (2<sup>nd</sup> spooler pass) for the second printer driver. In contrast, the claimed invention keeps the IR document in a shared data memory, so that multiple processes (plugins) can all access the same IR document in memory.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Claims 1 and 16 have been amended to recite a print subsystem that calls a plurality of plugins. Each of the plugins is able to access an IR document stored in a shared data memory for serial and/or parallel processing. As a result of the multiple plugin accesses, a multiple processed IR document is created. Assuming for the sake of argument that Kawamoto's printer drivers 203, 601, and 602 (second converting means) are analogous to the Applicant's plugins, Kawamoto does not process "intermediate code" using multiple print drivers, as his process only permits his intermediate code to be processed by a specific print driver associated with a particular printer. Therefore, Kawamoto does not generate a multiple processed IR document. Although Kawamoto does disclose multiple print drivers 203, 601, and 602, Kawamoto selects a specific print driver from the group, and processes the intermediate code using only the selected print driver. That is, only one of the multiple print drivers is selected for each processing operation. Instead of returning processed intermediate code to the first spooler 302 (Fig. 3), where it could theoretically be accessed by other drivers, print driver 203 delivers the processed code to system spooler 204. Thus, only a single print driver can process intermediate code before it is sent to printer 1500. Since each print driver is design to interface with a particular printer (col. 9, ln. 39-50), it would make no sense to send a document to a particular printer after it has been processed by 2 different types of print drivers. Alternately stated, it would make no sense for Kawamoto to prepare intermediate code for 2 different types of printers, once a particular printer (and print driver) have been selected.

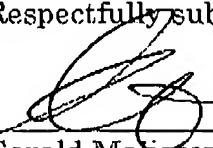
Kawamoto does not disclose the use of a plurality of plugins, parallel and/or serial processing of an IR document by the plugins, or the

generation of a multiple processed IR document. Since Kawamoto does not disclose the above-mentioned features, he does not disclose every limitation of claims 1 and 16. As Kawamoto does not explicitly describe every limitation of claims 1 and 16, he cannot anticipate these claims. Claims 2-4, 6-9, and 11-15, dependent from claim 1, and claims 17-19, 21-24, and 26-30, dependent from claim 16, enjoy the same advantages over the prior art, and the Applicant requests that the rejection be withdrawn.

Applicant has reviewed the references made of record and asserts that the claims are patentable over the references made of record. It is believed that the application is in condition for allowance and reconsideration is earnestly solicited.

Respectfully submitted,

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Gerald Maliszewski  
Registration No. 38,054

Customer Number 55,286  
P.O. Box 270829  
San Diego, CA 92198-2829  
Telephone: (858) 451-9950  
Facsimile: (858) 451-9869  
gerry@ipatentit.net